

EXHIBIT B

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April 23, 2013

Via US Mail and email – chad.hutchinson@butlersnow.com

Chad R. Hutchinson
Butler Snow
PO Box 6010
Ridgeland, MS 39158-6010

RE: Pelvic Mesh
Our file: 430-2000

Dear Chad:

I am responding to your letter of March 28, 2013. Specifically, you provided us with a “partial list” of Standard Operating Procedures for Ethicon therein and asked that we review the index and let you know which Procedures we want. We have now done so and would like a complete production of the Procedures listed in Exhibit A, attached, including the complete revision history and the effective date of each Procedure.

Please produce these Procedures as soon as possible. As you know, we are requesting that you do not just send us the current copy of each Procedure but, rather, provide us the entire revision history and the copies of the Procedures during the relevant time period (1998 – to current). Also, please let us know if you have confirmed whether or not the list of Standard Operating Procedures you sent on March 28th is the complete list. If not, please produce a list of the remaining Standard Operating Procedures at your earliest convenience.

We look forward to hearing from you soon so that we do not need to take this matter up with the Court.

Best regards.

Very truly yours,



Thomas P. Cartmell

LAW OFFICES

WAGSTAFF & CARTMELL LLP

TPC/mg

cc: Donna Jacobs
Christy Jones
Renee Baggett
Bryan Aylstock

EXHIBIT A TO CORRESPONDENCE DATED 4/23/13

Review of Policies (Design and Defect)

- 3-100081457
- 4-100083526
- 6-NTB-070
- 7-OP600-020
- 8-OP600-020
- 9-OP600-039
- 10-OP600-040
- 12-OP600-072
- 16-OP608-009
- 17-OP608-011
- 19-OP609-028
- 20-OP612-011
- 21-PR-0000009
- 26-PR-0000175
- 29-PR-0000216
- 30-PR-0000639
- 31-PR562-001
- 36-PR800-013
- 39-PR850-006
- 59-100021635
- 60-100021646
- 64-100028622
- 65-100032163
- 75-100040270
- 80-100045183
- 100-100050851
- 106-100055630
- 126-100059024
- 140-100061954
- 143-100065070
- 144-100065085
- 153-100074068
- 171-100083206
- 177-100092306
- 178-100094111
- 180-DR-0000004
- 183-DR-0000316
- 188-MS-0000345
- 190-MS201-001
- 191-MS207-012
- 198-OP204-011
- 200-OP210-004
- 208-OP600-026
- 209-OP600-062
- 211-OP600-074
- 212-OP600-085
- 215-OP601-005
- 216-OP601-007
- 222-OP603-334
- 224-OP607-052
- 225-OP611-079
- 227-OP611-140
- 230-OP613-002
- 232-OP650-011
- 233-OP650-011
- 234-OP653-011
- 235-OP653-011
- 251-PR-0000114
- 252-PR-0000118
- 253-PR-0000119
- 257-PR-0000174
- 288-PR-0000190
- 293-PR-0000193
- 294-PR-0000194
- 295-PR-0000194
- 298-PR-0000196
- 315-PR-0000213
- 319-PR-0000232
- 330-PR-0000303
- 342-PR-0000385
- 351-PR-0000564
- 353-PR-0000593
- 354-PR-0000608
- 362-PR-0011356
- 399-PR400-002
- 408-PR557-003
- 409-PR558-006
- 424-PR600-004
- 426-PR600-006
- 429-PR602-003
- 444-PS-0000002
- 453-PS-0000079
- 454-PS-0000080
- 455-PS-0000081

- 456-PS-0000083
- 457-PS-0000085
- 458-PS-0000086
- 459-PS-0000087
- 460-PS-0000088
- 461-PS-0000089
- 462-PS-0000090
- 463-PS-0000091
- 464-PS-0000092
- 467-PS-0000096
- 468-PS-0000097
- 469-PS-0000098
- 470-PS-0000099
- 471-PS-0000100
- 476-PS-0000105
- 477-PS-0000106
- 479-PS-0000108
- 480-PS-0000109
- 481-PS-0000110
- 482-PS-0000111
- 483-PS-0000112
- 484-PS-0000113
- 490-PS-0000164
- 491-PS-0000167
- 493-PS-0000193
- 499-PS-0001047
- 531-100085519
- 533-DDWG-0000101
- 534-OP608-007
- 535-OP608-011
- 536-OP608-016
- 539-PR-0000277
- 541-PR-0000592
- 542-PR-0000592
- 545-PR-0011368
- 549-PR800-002
- 589-QA-0000003
- 599-100057020
- 600-100057180
- 635-100083526
- 639-100086582
- 640-100086901
- 641-100086901
- 652-100095739
- 653-MS158-001
- 655-OP650-011
- 656-PR-0000173
- 665-PR-0000191
- 681-PR-0000252
- 683-PR-0000258
- 691-PR800-012
- 693-PS-0000490
- 699-PS-0001021
- 700-PS-0001023
- 708-QA-0000036
- 720-QA-0000078
- 721-QA-0000082
- 725-RMR-0000010
- 737-RMR-0000039
- 750-RMR-0000056
- 751-RMR-0000057
- 754-RMR-0000060
- 755-RMR-0000062
- 760-RMR-0000067
- 764-RMR-0000072
- 771-RMR-0000083
- 772-RMR-0000085
- 777-RS-0000004
- 779-RS-0000006
- 785-RS-0000012
- 790-RS-0000018
- 792-RS-0000020
- 795-RS-0000024
- 796-RS-0000025
- 824-UM-0000053
- 830-UM-0000144
- 839-PS-0000221
- 840-PS-0000282
- 846-PS-0000346
- 850-PS-0000435
- 852-PS-0000437
- 856-PS-0000486
- 857-PS-0000486
- 858-PS-0000487
- 861-PS-0000489
- 880-PS-0000522
- 881-PS-0000523